

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION

**STIPULATION REGARDING THE COMPELLING INTEREST
TO REMEDY THE EFFECTS OF DISCRIMINATION IN
FEDERAL CONTRACTING: A SURVEY OF RECENT EVIDENCE**

1. The Department of Justice began creation of *The Compelling Interest to Remedy the Effects of Discrimination in Federal Contracting: A Survey of Recent Evidence* (2022) (“2022 Compelling Interest Report”) in December 2019.
2. On March 4, 2020, the complaint in this matter was filed in the Eastern District of Tennessee. The work performed by attorneys at the Department of Justice preparing the report after that date through publication in the Federal Register in January 2022 was performed for use in this litigation as well as for other purposes.

Dated: May 13, 2022

/s/ Andrew Braniff
Andrew Braniff
Deputy Chief
Employment Litigation Section
Civil Rights Division
United States Department of Justice